Exhibit 13

Case 2:14-cv-11916-GCS-SDD ECF No. 121-14, PageID.4152 Filed 07/12/16 Page 2 of 9 FEES ANALYSIS OF OPPOSING COUNSELS' BILLING ENTRIES

VAGUE TASKS*

EX. 13

Date	Atty	Hrs	Description	Fees	Other Reasons to Exclude Entry	
3/24/2014	KeithF	1.5	Reviewed file and drafted demand letter	\$ 412.50	Block Billing	
			Researched relationship between remedies under			
5/7/2014	KeithF	2	FLSA and WFBA	\$ 550.00	Excessive	
5/12/2014	KeithF	2	Researched WPA and FLSA retailiation relationship	\$ 550.00	Excessive	
5/14/2014	KeithF	0.5	Reviewed filing and service of the complaint	\$ 137.50		
5/20/2014	KeithF	0.5	Emailed opposing counsel twice	\$ 137.50		
6/9/2014	KeithF	0.5	Researched corporate status	\$ 137.50		
			Reviewed file and strategized with RGM regarding		Conference/strategy	
6/10/2014	KeithF	0.7	settlement discussions	\$ 192.50	Block Billing	
			Review offer letter to employer, discussion with		Conference/strategy	
6/10/2014	RichardM	0.75	Keith Flynn, review matters in file	\$ 225.00	Block Billing	
6/11/2014	KeithF	0.5	Ltter to opposing counsel	\$ 137.50		
			Review letter to employer, discussion with		Conference/strategy	
6/14/2014	RichardM	1.5	associates	\$ 450.00	Block Billing	
7/8/2014	KeithF	0.1	Emailed opposing counsel after reviewing FRCP	\$ 27.50		
7/15/2014	KeithF	0.5	Spoke with client	\$ 137.50		
7/31/2014	KeithF	2	Reviewed file	\$ 550.00		
8/11/2014	AdaV	1.5	Review pleadings and documents	\$ 412.50		
8/19/2014	AdaV	0.1	Email client re waivers	\$ 27.50		
8/19/2014	AdaV	0.1	Email client re waivers	\$ 27.50		
8/25/2014	KeithF	1	Letter to client	\$ 275.00		
9/1/2014	KeithF	0.5	Email client	\$ 137.50		
9/30/2014	KeithF	0.5	Drafted witness list and reviewed file	\$ 137.50	Block Billing	
9/30/2014	AdaV	1.5	Review discovery responses	\$ 412.50		
					Conference/strategy	
10/2/2014	KeithF	0.2	Reviewed file and strategized regarding discovery	\$ 55.00	Block Billing	
11/6/2014	AdaV	3.5	Review discovery responses	\$ 962.50		
11/17/2014	AdaV	0.5	Review responses to discovery	\$ 137.50		
					Conference/strategy	
			Reviewed discovery and strategized way to resolve		Excessive	
12/4/2014	KeithF	2	the motion to compel	\$ 550.00	Block Billing	
12/5/2014	KeithF	0.2	Emailed client	\$ 55.00		

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Date	Atty	Hrs	Description	Fees	Other Reasons to Exclude Entry
12/12/2014	KeithF	0.5	Reviewed stip and orders and emailed OC	\$ 137.50	Block Billing
			Emailed court and opposing counsel; responded to		
12/15/2014	KeithF	0.1	an email from opposing counsel	\$ 27.50	Block Billing
12/19/2014	KeithF	0.5	Letter to client	\$ 137.50	
12/28/2014	KeithF	0.1	Emailed client	\$ 27.50	
1/5/2015	AdaV	2.5	Review supplemental discovery responses	\$ 687.50	
1/13/2015	KeithF	0.2	Emailed opposing counsel	\$ 55.00	
1/14/2015	KeithF	0.5	Reviewed file and emailed opposing counsel	\$ 137.50	Block Billing
1/20/2015	AdaV	5	Review supplemental discovery responses	\$ 1,375.00	
			Drafted supplemental discovery responses and		
1/22/2015	KeithF	1	emailed client	\$ 275.00	Block Billing
1/22/2015	AdaV	0.5	Review supplemental responses to discovery	\$ 137.50	
1/27/2015	KeithF	0.2	Spoke with client	\$ 55.00	
1/28/2015	KeithF	0.5	Spoke with client via email and telephone	\$ 137.50	
2/3/2015	KeithF	1	Reviewed file and emailed client and OC	\$ 275.00	Block Billing
2/5/2015	KeithF	0.2	Emailed client	\$ 55.00	
			Reviewed documents produced in discovery and		Excessive
2/6/2015	KeithF	5.5	emailed client	\$ 1,512.50	Block Billing
2/11/2015	KeithF	1	Letter to client	\$ 275.00	
2/13/2015	KeithF	0.5	Letter to client	\$ 137.50	
2/13/2015	KeithF	0.5	Reviewed file and emailed OC	\$ 137.50	Block Billing
			Reviewed our discovery responses and strategized		Conference/strategy
2/13/2015	KeithF	1	with AV	\$ 275.00	Block Billing
2/17/2015	KeithF	0.5	Emailed client	\$ 137.50	
					Conference/strategy
2/18/2015	KeithF	0.5	Reviewed file and strategized	\$ 137.50	Block Billing
2/19/2015	KeithF	0.5	Reviewed dep notices	\$ 137.50	Excessive
2/20/2015	KeithF	0.5	Emailed client	\$ 137.50	
2/20/2015	KeithF	1	Reviewed our discovery responses	\$ 275.00	Excessive
2/24/2015	KeithF	0.5	Reviewed file and emailed OC	\$ 137.50	Block Billing
			Reviewed prior correspondence and emailed OC re		
2/25/2015	KeithF	0.7	dates for deps and followed up with client	\$ 192.50	Block Billing
2/27/2015	KeithF	0.2	Emailed OC and client	\$ 55.00	Block Billing

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Date	Atty	Hrs	Description		Fees	Other Reasons to Exclude Entry	
			Emailed OC and client and reviewed file and			Conference/strategy	
3/2/2015	KeithF	0.2	strategized	\$	55.00	Block Billing	
						Conference/strategy	
						Excessive	
3/3/2015	KeithF	1	Emailed client and strageized with AV	\$	275.00	Block Billing	
						Excessive	
3/4/2015	KeithF	1	Emailed client and reviewed file	\$	275.00	Block Billing	
			Reviewed prior correspondence and emailed OC re				
			his unilateral dep notice and emailed back and forth				
3/4/2015	KeithF	0.5	about scheduling deps.	\$	137.50	Block Billing	
3/5/2015	KeithF	0.1	Reviewed file and emailed OC re Hood's dep	\$	27.50	Block Billing	
3/6/2015	KeithF	0.1	Emailed OC	\$	27.50		
3/9/2015	KeithF	0.5	Emailed client	\$	137.50		
3/10/2015	KeithF	0.5	Emailed client	\$	137.50		
3/11/2015	KeithF	0.1	Emailed client	\$	27.50		
						Excessive	
3/13/2015	KeithF	3	Reviewed discovery and prep for depositions	\$	825.00	Block Billing	
						Excessive	
3/15/2015	KeithF	3	Reviewed discovery and prep for depositions	\$	825.00	Block Billing	
						Conference/strategy	
			Reviewed discovery responses after taking			Excessive	
3/17/2015	KeithF	2	Wisheart's dep and strategized	\$	550.00	Block Billing	
			Review responses to interrogatories and requests to				
3/17/2015	AdaV	5	produce; draft 4th discovery requests	\$	1,375.00		
3/18/2015	KeithF	0.5	Email and letter to client	\$	137.50		
3/18/2015	KeithF	1	Emailed OC and client regarding discovery issues	\$	275.00	Block Billing	
			Reviewed protective order and email to OC re				
3/19/2015	KeithF	0.1	proposed changes to protective order	\$	27.50	Block Billing	
						Conference/strategy	
			Reviewed discovery document in preparation for	1		Excessive	
3/20/2015	KeithF	3	client's deposition and strategized	\$	825.00	Block Billing	

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Date	Atty	Hrs	Description	Fees	Other Reasons to Exclude Entry
					Conference/strategy
3/24/2015	KeithF	3	Reviewed reordings to supplement and strategized	\$ 825.00	Block Billing
					Conference/strategy
3/24/2015	RichardM	1.25	Review draft letter, discussion with associates	\$ 375.00	Block Billing
			Reviewed discovery and editing questions in prep for		
3/25/2015	KeithF	2	Hood's dep	\$ 550.00	Block Billing
					Conference/strategy
3/30/2015	KeithF	2	Edited motion to compel and meeting with Richard	\$ 550.00	Block Billing
3/30/2015	RichardM	0.25	Review emails	\$ 75.00	
			Review emails about phone issues, discuss issue with		Conference/strategy
3/31/2015	RichardM	0.75	associates	\$ 225.00	Block Billing
			Review emails from opposing counsel, discuss issue		Conference/strategy
4/1/2015	RichardM	0.1	with associates concerning motions	\$ 30.00	Block Billing
4/6/2015	KeithF	2	Research re discovery issues	\$ 550.00	Excessive
			Review emails from opposing counsel, discussion		Conference/strategy
4/6/2015	RichardM	1.25	with associates about motion for discovery	\$ 375.00	Block Billing
			Reviewed prior correspondence and changes to the		Conference/strategy
			stip and order and emailed OC re stip and order and		Excessive
4/10/2015	KeithF	1	discussed with RGM	\$ 275.00	Block Billing
			Review matters in file concerning stipulation and		Conference/strategy
4/10/2015	RichardM	0.75	order, discussion with associates	\$ 225.00	Block Billing
			Reviewed subpoena documents and emailed court		
4/27/2015	KeithF	1	reporter	\$ 275.00	Block Billing
					Excessive
5/1/2015	AGraham	4	Review pleadings, discovery for Hood Deposition	\$	Block Billing
5/5/2015	AGraham	7	Attend Hood Deposition	\$ 1,750.00	
			Review emails from opposing counsel, discuss		Conference/strategy
5/5/2015	RichardM	1	matter with associates	\$	Block Billing
5/6/2015	AGraham	3	Draft motion to Extend Response	\$ 750.00	
			Review matters in file, concerning filing from		
			attorney for defendant, discuss issues with		Conference/strategy
5/7/2015	RichardM	0.75	associates (5/7 -5/8)	\$ 225.00	Block Billing

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VAGUE TASKS*

EX. 13

Date	Atty	Hrs	Description	Fees	Other Reasons to Exclude Entry	
			Review emails, discussion with associates regarding		Conference/strategy	
5/20/2015	RichardM	1	proper representation	\$ 300.00	Block Billing	
5/21/2015	AGraham	1	Review case file and cases for MSJ Response	\$ 250.00		
5/22/2015	AGraham	3.5	Review case materials for MSJ Response	\$ 875.00		
5/23/2015	AGraham	2.5	Draft MSJ material	\$ 625.00		
					Conference/strategy	
					Excessive	
6/5/2015	KeithF	2.5	Reviewed file re MSJ motion and strategized with AG	\$ 687.50	Block Billing	
			Reviewed file and strategized with AG re forensic		Conference/strategy	
6/8/2015	KeithF	2	exam and MSJ response	\$ 550.00	Block Billing	
6/16/2015	KeithF	0.2	Phone call with witness	\$ 55.00		
6/17/2015	KeithF	0.5	Emailed client	\$ 137.50		
6/19/2015	KeithF	2.5	Met with client	\$ 687.50		
6/22/2015	KeithF	1	Reviewed pleadings	\$ 275.00		
6/30/2015	KeithF	2	Reviewed discovery issues re cell phone	\$ 550.00	Excessive	
7/1/2015	KeithF	0.7	Several emails to OC re disassembling the phone	\$ 192.50		
			Review matters in file, discuss issue of forensic			
			examination of cell phone of client, review various		Conference/strategy	
7/1/2015	RichardM	2	emails	\$ 600.00	Block Billing	
7/2/2015	KeithF	0.5	Emailed OC about phone and spoke to client	\$ 137.50	Block Billing	
					Conference/strategy	
7/13/2015	KeithF	0.5	Reviewed stip and order and discussed case with AG	\$ 137.50	Block Billing	
			Review matters in file, discuss matters in file with		Conference/strategy	
7/15/2015	RichardM	0.75	associates	\$ 225.00	Block Billing	
7/26/2015	KeithF	0.5	Objections to phone records	\$ 137.50		
			Reviewed amended complaint and discussed with		Conference/strategy	
8/14/2015	KeithF	0.5	AG	\$ 137.50	Block Billing	
9/24/2015	KeithF	0.5	Spoke with client	\$ 137.50		
			Researched jury verdict reports, drafted a demand			
			letter, reviewed the file and strategized with RGM		Conference/strategy	
9/25/2015	KeithF	2.7	and AG	\$ 742.50	Block Billing	
			Review matters in file, discuss settlement strategy		Conference/strategy	
9/25/2015	RichardM	0.5	with associates	\$ 150.00	Block Billing	

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Date	Atty	Hrs	Description	Fees	Other Reasons to Exclude Entry
			Keith re: trial prep and emails to opposing counsel re:		Conference/strategy
11/4/2015	AGraham	1	subpoenas	\$ 250.00	Block Billing
11/10/2015	KeithF	8	Reviewed deps and pleadings for trial	\$ 2,200.00	
11/11/2015	KeithF	4	Reviewed deps for trial	\$ 1,100.00	
			Reviewed deps for trial and discussed subpoenas		Conference/strategy
11/12/2015	KeithF	6	with AG	\$ 1,650.00	Block Billing
11/14/2015	KeithF	5	Reviewed exhibits	\$ 1,375.00	
11/15/2015	AGraham	1.5	Interviews of Reeser witnesses	\$ 375.00	
			Reviewing exhibits and deps for trial and strategized		Conference/strategy
/ /	KeithF	8	with AG	\$ 	Block Billing
11/16/2015	AGraham	0.7	Reeser Witnesses telephone calls	\$ 175.00	
			Reviewed file, edited pre-trial order, and discussed		Conference/strategy
	KeithF	4	case with AG and RGM	\$	Block Billing
11/21/2015	KeithF	8	Meeting with client re jury trial	\$ 2,200.00	
			Reviewed file, discussed case with RGM and emailed		Conference/strategy
11/23/2015	KeithF	2	client	\$ 550.00	Block Billing
			Met with OC re pre-trial conference and spoke to		
11/24/2015	KeithF	3	client	\$ 825.00	Block Billing
			Final pretrial meeting with opposing counsel and call		
11/24/2015	AGraham	3	to client re: meeting	\$ 750.00	Block Billing
					Conference/strategy
	KeithF	1	Reviewed file and discussed case with AG	\$	Block Billing
12/4/2015	AGraham	0.1	Email re: rescheduling pretrial conference dates	\$ 25.00	
12/9/2015	AGraham	0.6	Email re: scheduling dates	\$ 150.00	
1/18/2016	KeithF	3.5	Prep for final pre-trial conference	\$ 962.50	
		_			
1/19/2016	KeithF	4	Prepared for and attended final pre-trial conference	\$ 1,100.00	Block Billing
. / /			Reviewed file re supplemental discovery responses		
1/22/2016	KeithF	0.5	and the verification page	\$ 137.50	
			Discuss supplement to interrogatories with Keith		Conference/strategy
1/22/2016	AGraham	0.2	Flynn, call Client	\$	Block Billing
3/1/2016	KeithF	0.5	Reviewed file and edited settlement statement	\$ 137.50	Block Billing

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Date	Atty	Hrs	Description	Fees	Other Reasons to Exclude Entry
			Talk to Keith Flynn about settlement conference,		Conference/strategy
3/5/2016	AGraham	0.5	email, call, text Client	\$ 125.00	Block Billing
			Reviewed file re Motions in Limine and dep of		
3/7/2016	KeithF	1.5	Goodroe	\$ 412.50	
3/7/2016	AGraham	3.2	Motion in limine, and Kris Goodroe call	\$ 800.00	Block Billing
			Prepped for and attended Mediation and discussed		
3/10/2016	KeithF	4	with client	\$ 1,100.00	Block Billing
3/23/2016	KeithF	3	Research for Motions in Limine	\$ 825.00	
3/24/2016	KeithF	7	Edited responses to Motion in Limine	\$ 1,925.00	
			Discussion with Keith re: Reeser, research for reply		Conference/strategy
4/6/2016	AGraham	3	brief	\$ 750.00	Block Billing
4/7/2016	KeithF	3	Reeser reply to Defendant's Motions in Limine	\$ 825.00	
4/15/2016	KeithF	4	Reviewed the trial exhibits	\$ 1,100.00	
			Reviewed pleadings and began preparing trial prep		
4/18/2016	KeithF	6	materials	\$ 1,650.00	Block Billing
			Prepping testimony of Wisheart and Hood and		Conference/strategy
4/20/2016	KeithF	7	discussed case with AG	\$ 1,925.00	Block Billing
4/21/2016	KeithF	5	Reviewing trial exhibits	\$ 1,375.00	
			Reviewed file re medical records and discussed with		Conference/strategy
4/22/2016	KeithF	1	AG	\$ 275.00	Block Billing
			Call with Keith Flynn re: discovery, discussion with		Conference/strategy
			Michelle Coil re: reissuing subpoenas, emails to		CLERICAL
4/22/2016	AGraham	1.6	opposing counsel, telephone to client	\$ 400.00	Block Billing
4/24/2016	KeithF	4	Reviewed exhibits	\$ 1,100.00	
4/24/2016	KeithF	1	Reviewed prior correspondence	\$ 275.00	
			Reviewed file and prepped testimony and discussed		Conference/strategy
4/26/2016	KeithF	4	case with AG	\$ 1,100.00	Block Billing
4/27/2016	KeithF	4	Drafted opening statement	\$ 1,100.00	
4/28/2016	KeithF	4	Met with witness	\$ 1,100.00	
			Prepped notes, reviewed deps, put together trial		CLERICAL
4/28/2016	KeithF	6	binder, reviewed law	\$ 1,650.00	Block Billing
5/1/2016	KeithF	3	Reviewed exhibits	\$ 825.00	
5/2/2016	KeithF	2	Reviewed summary of the law	\$ 550.00	
5/2/2016	AGraham	0.7	Draft two page summary to file	\$ 175.00	

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VAGUE TASKS*

EX. 13

Date	Atty	Hrs	Description	Fees	Other Reasons to Exclude Entry	
5/2/2016	AGraham	0.1	Emails to opposing counsel	\$ 25.00		
5/3/2016	KeithF	4	Meeting with client	\$ 1,100.00		
5/3/2016	KeithF	2	Meeting with witness	\$ 550.00		
5/3/2016	KeithF	2	Reviewed exhibits	\$ 550.00		
					Excessive	
5/4/2016	KeithF	8	Prepped for and met with client	\$ 2,200.00	Block Billing	
					Excessive	
5/5/2016	KeithF	10	Prepped for and met with client	\$ 2,750.00	Block Billing	
					Excessive	
5/6/2016	KeithF	7	Prepped for and met with client	\$ 1,925.00	Block Billing	
5/6/2016	KeithF	2	Spoke with witness	\$ 550.00		
5/7/2016	KeithF	8	Met with client	\$ 2,200.00	Excessive	
5/8/2016	KeithF	4	Edited and practiced opening statement	\$	Block Billing	
5/9/2016	KeithF	4.5	Met with client	\$ 1,237.50		
5/10/2016	KeithF	4	Met with client	\$ 1,100.00		
5/14/2016	RichardM	2	Review matters in preparation for trial	\$ 600.00		
5/16/2016	RichardM	0.75	Review matters in preparation for trial	\$ 225.00		
5/17/2016	RichardM	0.5	Assist in preparation for trial, review matters in file	\$ 150.00	Block Billing	
5/18/2016	KeithF	4	Met with client	\$ 1,100.00		
	Total:	336.85		\$ 92,100.00		